

McCORRISTON MILLER MUKAI MacKINNON LLP

DAVID J. MINKIN 3639-0

LISA W. CATALDO 6159-0

Five Waterfront Plaza, 4<sup>th</sup> Floor

500 Ala Moana Boulevard

Honolulu, Hawaii 96813

Telephone: (808) 529-7300

Facsimile: (808) 524-8293

Email: [minkin@m4law.com](mailto:minkin@m4law.com)

Attorneys for Plaintiffs Trustees  
of the Hawaii Carpenters Trust Funds

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

**HAWAII CARPENTERS TRUST ) CIVIL NO. CV02-00425 JMS BMK**  
**FUNDS, (Health & Welfare Fund )**  
by its trustees Albert ) PLAINTIFF'S MOTION FOR  
Hamamoto, Audrey Hidano, ) ENTRY OF DEFAULT JUDGMENT  
Henry Iida, Glen Kaneshige, ) AGAINST DEFENDANT DYNAMIC  
Thomas Toma, Daniel Tom, ) INTERIORS, INC.;  
Elmer Cabico, Paul C.K. Chang, ) MEMORANDUM IN SUPPORT OF  
Ronald Taketa, Melvin Fujii, ) MOTION; DECLARATION OF  
Clifford Resacio, Russell Young ) DAVID J. MINKIN; EXHIBITS "1" -  
and Keith Hirota; ) "5"; CERTIFICATE OF SERVICE  
*Apprenticeship & Training Fund )*  
by its trustees James Ramirez, )  
Russell Ogata, Conrad )  
Murashige, Robert Donle, )  
Angela Chinen, Dante Agra, )  
Ron Taketa, Sidney Shimokawa, )  
Dean Takahashi and Russell ) Trial Date: None  
Hiranaka; *Vacation & Holiday )*  
*Fund* by its trustees James )

Watanabe, James Ramirez, )  
Gerard Sakamoto, Paul Sasaki, )  
Jiggs Tamashiro, Mark Erwin, )  
Michael Spain, Jr., Rockwell )  
Rogers, Jr., Curtis Kern, Patrick )  
Borge, Sr. and Lloyd Kupau, )  
Jr.; *Market Recovery Program* by )  
its trustees Edmund Aczon, )  
Thalia Choy, Steven Hidano, )  
Claude Matsumoto, Gerard )  
Sakamoto, Albert Belliveau, )  
Michael Spain, Jr., Ronald )  
Taketa, Glenn Young and Jason )  
Orita; *Financial Security Fund* )  
by its trustees Kenneth )  
Sakurai, Gordon L. Scruton, )  
James Watanabe, Conrad )  
Murashige, Lance Wilhelm, )  
Brian Hedge, Rockwell Rogers, )  
Jr., Bruce Soileau, Ronald )  
Taketa, Tim McCormack, )  
Kenneth Spence, Jack Reeves )  
and Ralph Yackley), )

Plaintiffs, )

vs. )

**DYNAMIC INTERIORS, INC.**, a )  
Hawaii corporation, )

Defendant. )

---

PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT  
JUDGMENT AGAINST DEFENDANT DYNAMIC INTERIORS, INC.

Plaintiff HAWAII CARPENTERS TRUST FUNDS, by its trustees, et al. (hereinafter "HCTF") by and through its attorneys, McCorriston Miller Mukai MacKinnon LLP, hereby respectfully moves this Court for an order granting default judgment against Defendant DYNAMIC INTERIORS, INC. (hereinafter "Dynamic"). Default against Defendant DYNAMIC INTERIORS, INC., was entered by the Clerk of the Court on January 9, 2003.

This Motion is made pursuant to Rules 7 and 55(b)(1) of the Federal Rules of Civil Procedure and is supported by the attached Memorandum in Support of Motion, Declaration of David J. Minkin, exhibits, and the records and files herein.

DATED: Honolulu, Hawaii, March 1, 2006.

/s/ David J. Minkin  
DAVID J. MINKIN  
LISA W. CATALDO

Attorneys for Plaintiff  
HAWAII CARPENTERS TRUST FUNDS